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July 9, 2022

Hon. Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: <u>United States v. Joseph Minetto</u> Ind. No 19 Cr 833 (SHS)

Dear Judge Stein:

This letter is respectfully submitted to request that the sentencing proceeding currently scheduled for July 28, 2022 be adjourned to a date in late October that may be convenient to the Court. An additional medical issue has arisen since my previous request that also complicates the treatment plan for preexisting conditions.

To summarize, Mr. Minetto requires replacements of both hips. He had hoped to do the the first one in June. However in May he suffered a full distal biceps rupture that required surgery within 2 weeks to repair the complete tear. The tear occurred as a result of Mr. Minetto's congenital disease known as Ehlers Danlos, a condition characterized by weakened connective tissue. The surgery consisted of an open incision and anchors to reattach the tendon to the elbow.

Hip replacement (also the result of Ehlers Danlos) and another bothersome issue had to be delayed. He is now 3-4 weeks post op and beginning physical therapy on his arm. He will be permitted to bear weight in his left arm beginning the first week of August. The full recovery time for the repair is 6 months. The government consents to the adjournment. Thank you for your consideration of this matter.

Respectfully submitted,

Michael H. Sporn

MHS/ss

Cc: Robert Sobelman, Esq. Sophia Grigolo, U.S.P.T.O.